

DANIEL J. TREUDEN, ESQ
Wisconsin Bar No. 1052766
THE BERNHOFT LAW FIRM, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
(512) 582-2100 telephone
(512) 373-3159 facsimile
djtreuden@bernhoflaw.com

JOEL F. HANSEN, ESQ.
Nevada Bar No. 1876
HANSEN & HANSEN, LLC
9030 W. Cheyenne Avenue, #210
(702) 906-1300 office
(702) 366-1857: facsimile
efile@hansenlawyers.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN
and JANE DOES 1-100,

Defendants.

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINES TO RESPOND AND REPLY
TO MOTION FOR LEAVE TO FILE TO
FILE MOTION UNDER SEAL
(First Request)**

Pursuant to Local Rule IA 6-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BANA"), by and through their respective attorneys of record, hereby jointly stipulate to modestly extend the Plaintiffs' deadline to respond to BANA's Motion for Leave to File Motion Under Seal filed on May 24, 2021, (Doc. 113), and to modestly extend BANA's deadline to reply. This is the first joint stipulation requesting an

extension of time to extend the deadlines in the briefing schedule involving the Motion for Leave to file Motion Under Seal. (Doc. 113.) A hearing is scheduled on this motion on July 13, 2021 at 10:00 a.m. PDT. (Doc. 121.) In support thereof, the Plaintiffs and BANA represent as follows:

The Plaintiffs require more time to review the 700 pages of exhibits that accompany the Motion for Summary Judgment to determine their position on which pages should remain sealed and which can or should be unsealed. The Parties stipulate that a 10-day extension to June 17, 2021 for the Plaintiffs' response and fourteen days to July 1, 2021 to file BANA's reply is sufficient.

Accordingly, the Parties agree that the foregoing constitutes good cause to extend the deadline to file the Reply Brief. This is the Parties' first request for an extension of the deadline related to the Motion to Compel. The Parties agree that the requested extension will not prejudice any Party. No deadline for which an extension is requested herein has expired.

Accordingly, the Parties agree there is good cause for entry of the following new deadline: Plaintiff's time to file response papers is extended to June 17, 2021 and BANA's time to file Reply papers in further support of the Motion to Compel is extended to July 1, 2021.

IT IS SO STIPULATED.

Dated: June 7, 2021
THE BERNHOFT LAW FIRM, S.C.

/s/ Daniel J. Treuden
Daniel J. Treuden, Esq.
Wisconsin Bar No. 1052766
1402 E. Cesar Chavez Street
Austin, Texas 78702

Attorney for Plaintiffs
Appearing *pro hac vice*

Dated: June 7, 2021
SNELL & WILMER, L.L.P.

/s/ Holly E. Cheong
Amy F. Sorenson (NV Bar 12495)
Blakeley E. Griffith, Esq. (NV Bar 12386)
Holly E. Cheong (NV Bar 11936)
3883 Howard Hughes Pkwy, Ste. 1100
Las Vegas, Nevada 89169

Attorneys for Bank of America, N.A.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: June 11, 2021